

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:
THE ROMAN CATHOLIC DIOCESE OF
SYRACUSE, NEW YORK,

Debtor.

Case No. 20-30663-5-wak

Chapter 11

Hon. Wendy A. Kinsella

**WESTCHESTER FIRE INSURANCE COMPANY’S REQUEST FOR ORDER TO
SHORTEN NOTICE PERIOD BY ONE DAY**

Westchester Fire Insurance Company (“Westchester Fire”), pursuant to Fed. R. Bankr. P. 9006(c)(1), respectfully request that the time period requirement for filing a motion 21 days before the return date of that motion be shortened by 1 day to permit Westchester Fire to be heard at the next omnibus hearing its motion for an order directing the “Parish Steering Committee” and its Law Firms to comply with Bankruptcy Rule 2019, and (ii) barring them to be heard if they fail to comply (the “Motion,” Dkt. No. 1686).

1. Westchester Fire faces an imminent deadline to respond *next week* to the adversary proceeding complaint that was signed and filed by counsel for the Parish Steering Committee, and brought on behalf of certain (but not all) non-debtor parishes. Westchester Fire also has outstanding requests for aid and assistance to the Parish Steering Committee’s Law Firms in connection with the treatment of the contracts of non-debtor parishes under the plan and the claim that is the subject of a claims objection.

2. As discussed in that Motion, there is serious confusion as to who the Parish Steering Committee and its Law Firms represent, as they have ostensibly appeared on behalf of *all non-debtor parishes* and “**certain other [unknown] entities**”—many of whom have

drastically different positions, interests and stake in the bankruptcy case and the adversary proceeding.

3. Despite confirming that they will comply with their mandatory Rule 2019 disclosure obligations on February 7, 2024—the Parish Steering Committee and its Law Firms have not complied to this day. Delay in such mandatory disclosures have prevented Westchester Fire and other Parish insurers from understanding exactly who or what the Parish Steering Committee and its Law Firms represent, with no information to consider what conflict of interests are afoot.

4. Therefore, Westchester Fire has concern for its Motion that should be heard as early as possible, March 7, 2024, the next available hearing date for the Court. Without a one-day exception for Westchester Fire’s Motion, the parties would be scheduled for the following hearing date of March 28, 2024, by which time substantial papers would be filed in the bankruptcy (especially with regard to the Debtor’s anticipated revised disclosure statement for its proposed plan).

5. Counsel for Westchester Fire called counsel for the Parish Steering Committee and a left message over the phone and by e-mail, requesting his consent to this motion, but as of the time of this filing have not heard back.

6. Therefore, Westchester Fire asks to be heard on its Motion at the next calendared hearing date, **March 7, 2024**.

Dated: February 16, 2024

Respectfully submitted,

By: /s/ Tancred V. Schiavoni

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